Richard E. Leff, Esq. (RL-2123) McGIVNEY & KLUGER, P.C. 80 Broad Street, 23rd Floor New York, New York 10004 (212) 509-3456

Attorneys for Defendant: GRUBB & ELLIS MANAGEMENT SERVICES, INC.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X 21 MC 102 (AKH)

ROSA ORTIZ (AND HUSBAND, ELIO YUMBLA),

Index No.: 07-CV-01676

Plaintiff(s),

NOTICE OF ADOPTION OF ANSWER

TO MASTER COMPLAINT

-against-

ELECTRONICALLY FILED

90 CHURCH STREET LIMITED PARTNERSHIP, et al.,

Defendant(s).

PLEASE TAKE NOTICE that Defendant, GRUBB & ELLIS MANAGEMENT SERVICES, INC., by its attorneys, McGIVNEY & KLUGER, P.C., as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, GRUBB & ELLIS MANAGEMENT SERVICES, INC., demands judgment dismissing the above-captioned action as against it,

together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
December 13, 2007

Yours etc.,

McGIVNEY & KLUGER, P.C. Attorneys for Defendant GRUBB & ELLIS MANAGEMENT SERVICES, INC.

Richard E. Leff (BL-2123) 80 Broad Street, 23rd Floor New York, New York 10004 (212) 509-3456

TO: WORBY GRONER & NAPOLI BERN, LLP Plaintiffs Liaison
In Re Lower Manhattan Disaster Site Litigation
115 Broadway, 12th Floor
New York, New York 10006
(212) 267-3700

All Defense Counsel